

Comments to CA Water Plan 2013 Volume 3 Resource Management Strategies due 12.2.2013

Joyce Dillard [dillardjoyce@yahoo.com]

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To: DWR CWP Comments

There is a definite disconnect between planning and reality.

Chapter 4 Flood Management

There is no requirement for current plan updating with current information nor is there a requirement that the General Plan and its Elements have current information.

With increased density in urban areas in order to produce city and state revenue along with a desire for an ecosystem restoration, as in the LA RIVER ECOSYSTEM FEASIBILITY STUDY, there are increased risks and recovery costs. These restorations are front projects for hotel and tourism development along flood channels.

Infrastructure planning needs to be encoded in California law.

Restoration of Natural Floodplain Functions is not studied or documented enough to disallow development, as in the case of a project called HIDDEN CREEK ESTATES. This is a LA County SEA Significant Ecological Area that is being annexed to the City of Los Angeles and has received approval by the LA City Planning Commission without going through the formal annexation process. In fact the out-of-state developer is ignoring any LA County actions thinking the City will have full jurisdiction.

Watershed and wildlife destruction as well as flood management faces a new paradigm.

Greater LA County IRWMP failed to address this issue.

Wetlands are not being maintained as an ecological answer. With the advent of Public-Private Partnerships PPP, wetlands, such as BALLONA CREEK, are conduits as development enhancements. Permitting is even being designed by the private non-profit (as a PPP partner) using the government agency (LA County Flood Control) as their front man.

We cannot sustain systems with the PPP influence over the responsibilities of agencies.

Wildlife, migratory birds and plants are not even being considered in the overall aspect of natural systems.

SEA Significant Ecological Areas must be protected areas. So far, the designation has no legal weight.

Chapter 5 Conveyance-Delta

Monterey Shale areas and the potential for fracking and wastewater injection seismicity issues need to be identified and discussed not only for the immediate Delta region, but for the regions that receive water delivery.

Losses could be in the billions if not trillions with many lives at stake if deliveries are cut-off.

Chapter 5 Conveyance- Regional /Local Chapter 18 Pollution Prevention

Chemical trails (chem. trails) are released in the skies without any announcement. Effects on the water distribution including pollutant loads have never been discussed.

Fluoridation should be considered a pollutant.

Chapter 12 Municipal Recycled Water
Chapter 20 Urban Stormwater Runoff Management

The cost-benefit ratio for purple pipe distribution of recycled water has not been disclosed, locally or at a state level.

Yet, there is a more perplexing controversy. Regulated municipal recycled water differs from non-regulated municipal water captured from stormdrain system and brought to a site-location for landscaping.

This differs from the California Building Safety standards, as it is not Rainwater Harvesting or Gray Water. It is a created system of stormwater capture without the CA Department of Public Health requirements for recycled water.

City of Los Angeles through its local bond Proposition O has created this new capture system in the Temescal Canyon Park Stormwater BMP Project and Penmar Water Quality Improvement Project. There are no local or state regulations over this off-site stormwater capture to a park on-site treatment tank.

We fear disease and public safety issues.

Chapter 24 Land Use Planning and Management

This area is key yet has no connection with water in the reality of Land Use Planning and Project Approvals.

Watersheds are not a consideration, but local jurisdictions such as Council Districts are.

There needs to be a realistic connection between water delivery and density. We see, in the City of Los Angeles, density increased in the Housing Element far beyond the Metropolitan Planning Organization MPO (SCAG So CA Council of Governments) population estimations.

Water Supply is just not an issue on either SCAG or the City's end.

There needs to be California State laws that place watershed as a viable category in Land Use Planning.

Again, plans must be current and not 10 to 40 years old.

LID Low Impact Development Ordinances are only effective if the Soils and Geology can be permeated. When oil and gas lie beneath the ground LID ordinances are detrimental. Because of the unique cases in Los Angeles, Santa Barbara and San Joaquin Valley, LID ordinances should not be a statewide solution.

Councils of Governments do not play a role in Water and Land Use Planning.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031